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January 6, 1994

Office of the Secretary
Federal Communications Commission
Washington, D.C.
20554

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COMMENTS ON CC Docket No. 94-102
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 9-1-1
Emergency Calling Systems

Dear Sirs,

Harris Digital Telephone Systems (Harris DTS) is a manufacturer of the 20-20 PBX system which ranges in size from 100 ports to 10,000 ports. Many of our larger systems operate as "dispersed private telephone systems" and so our product line would be subject to the proposed requirements.

We agree with the FCC that PBX callers will benefit from access to Enhanced 9-1-1 services. However, before determining the means by which this access will be achieved we believe that the FCC should further evaluate the economic impact, market forces, and available technologies. This letter briefly comments on these issues and requests further information so that we may clearly assess the effect that these proposed rules will have on our business.

The subject Notice of Proposed Rulemaking overlooks the trend towards working from the home. This trend manifests itself in applications such as "cottage ACD*" where participants perform call answering services from their homes via Off-Premise Extension (OPX) lines. The proposed rules appear to require that the PBX user assign each home-worker a unique Station ID and Location Identification Data. If the OPX were served by a different PSAP other than the main location of the PBX, the proposed rules appear to require that the PBX user procure an additional 9-1-1 trunk from the PBX to the PSAP serving a particular worker. Harris DTS believes that these additional financial burdens imposed by the proposed 9-1-1 rules will have a negative economic impact on and significantly dampen the cottage ACD industry, denying employment to a significant of home-bound workers. (*ACD = Automatic Call Distribution)

Harris DTS agrees with the FCC that market forces have not given the PBX caller access to 9-1-1 services. However, we believe that the market has been hampered by a lack of standards rather than a lack of a willingness on the part manufacturers to provide such capabilities. Today, there is no standard to query an ALI (Automatic Location Identification) database. Today, there is no 9-1-1 trunking standard that delivers a 10-digit calling number. Today, there is no standard format for providing address information**. Today, there is no standard for an ANI to ALI controller interface.

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HARRIS CORPORATION

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Harris DTS believes that the FCC can greatly benefit both users and providers of 9-1-1 service by encouraging the definition and establishment of standards for equipment that accesses or provides Enhanced 9-1-1 service. Moreover, we believe that user demand for 9-1-1 access is so great that manufacturers will readily build to these standards once available. (**We recognize that NENA has proposed a standard address format. However, NENA is not a recognized standards body such as ANSI. Consequently, NENA's proposal has not received the visibility, comment, and acceptance that is necessary for it to gain acceptance among telecommunications equipment manufacturers.)

Harris DTS believes that the proposed FCC rules do not adequately consider the ability of newer telecommunications technology to readily provide Enhanced 9-1-1 services to PBX callers. In particular ISDN technology is well suited to deliver address information along with a 9-1-1 emergency call. In addition an ISDN based emergency network will provide faster call delivery times and eliminate the time consuming ALI query. Harris DTS believes that the FCC can greatly benefit both users and providers of 9-1-1 service by encouraging 9-1-1 networks to adopt current technology. In 9-1-1 seconds mean lives.

Before Harris DTS can adequately assess the direct impact that the proposed rules, Section 68.320 in particular, will have on our business, we request that the FCC clarify several technical issues. We present these issues as a list of questions in an attachment to this letter.

We request that the FCC consider these comments on Docket 94-102. Harris DTS supports the provision Enhanced 9-1-1 services to PBX callers. However, we believe that this service will be provided more quickly and effectively if the FCC promotes the adoption of 9-1-1 standards and encourages 9-1-1 service providers to migrate to current telecommunications technology.

Regards,

A handwritten signature in black ink, appearing to read 'R. Daniel Foley', is written over the word 'Regards,'.

R. Daniel Foley
Manager,
Computer-Telephony Integration
Harris Digital Telephone Systems

**ATTACHMENT
QUESTIONS REGARDING
FCC NOTICE OF PROPOSED RULE MAKING
CC DOCKET NUMBER: 94-102**

1. What busy hour traffic does P.01 grade of service assume?
2. What is Location Data? NENA (National Emergency Number Association) standard, Telco Standard?, FCC Requirement?
3. Will 9-1-1 trunks go to more than one PSAP if the area served by the PBX is served by multiple PSAPs?
4. Why not recommend CAMA/TSPS or 9-1-1 trunking that PSAPs currently use?
5. What is format of Callback Number? Public Number?, Main Number + Extension?
6. Does the term "devices" in 68.320 mean telephone sets?
7. Can Third Party Products be used as adjuncts to the PBX to fulfill 9-1-1 requirements?
8. Does the FCC plan any requirements regarding Direct Inward System Access (DISA) calls?